

June 7, 2006

Comments of Journal Broadcast Group, Inc.
In Re: Proceeding **98-120**

Journal Broadcast Group, Inc., headquartered in Milwaukee, Wisconsin, owns and operates nine television stations in 7 states and programs two additional television stations under local marketing agreements.

Journal intends to make use of its digital multicast capabilities to serve its communities of license with additional channels of local news, information, and entertainment. Earlier this year, Journal's WTMJ-TV in Milwaukee launched an all-new 24-hour local weather service on channel 4.2. This service is available to viewers over the air; via video streaming on the WTMJ-TV website; and on Time Warner Cable as part of its basic digital tier. Within the next few weeks, Journal's KTNV-TV in Las Vegas, Nevada plans to launch a similar all-new, all-local information service focused on traffic information and weather in that metropolitan area. Thanks to the willing partnership of local cable franchisees in both Las Vegas and Milwaukee who made channel allocations available to Journal as part of our retransmission consent negotiations, tens of thousands of viewing households will have easy access to these important new local services offered by Journal.

However, Journal has been disappointed to find that not all local cable franchisees are willing to cooperate in delivering such new services to their communities, even when Journal has offered to negotiate in good faith for a channel allocation. For example, in Tucson, Arizona, Journal's KGUN-TV has been flatly rejected by one major cable MSO in its efforts to negotiate a cable channel allocation for new local service. Curiously, this MSO is one with which Journal has successfully negotiated such an allocation in another community. We have been unable to determine any reason for the MSO's intransigence in Tucson, other than the apparent personal preferences of the local market manager at the cable system.

For this reason, Journal believes it is essential for the FCC to require digital multicast must carry. Local broadcasters have invested billions of dollars in capital to build out terrestrial digital broadcast capabilities. Many, like Journal, have committed to invest even more in order to provide important new local service to our communities of license, thanks to the opportunities created by digital multicasting. However, in some communities these new services will never see the light of day unless cable operators are required to carry all local services to their subscribers.